## TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway Nashville, Tennessee 37243-0505

September 26, 2012

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW, Room TW-A306 Washington, D.C. 20554

RE: Pursuant to Federal Rule 54.314(a), October 1<sup>st</sup> Certification Requirement for High-Cost Universal Service Support, CC Docket No. 96-45.

Dear Ms. Dortch:

This letter is sent to certify that BellSouth Telecommunications, LLC d/b/a AT&T Tennessee ("AT&T Tennessee") has provided self certification that federal high-cost support will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C.§ 254(e) of the Telecommunications Act of 1996. Support, for which AT&T Tennessee is being certified for years 2011 and 2013, includes Interstate Access Support (IAS) within Study Area Code (SAC) 295185.

Until the FCC issued its USF/ICC Transformation Order (17 FCC Rcd 17663) in November 2011, AT&T Tennessee submitted certifications directly to the FCC, and not to the Tennessee Regulatory Authority ("Authority"), because it only received Interstate Access Support (IAS).

At the same time, the FCC expanded the state certification requirements to require state Commissions to include even carriers that only receive IAS support, which the FCC now calls "frozen support", in their annual certifications to the FCC.

Accordingly, AT&T Tennessee submitted the proper self-certification documentation to the Authority and is in compliance with 47 U.S.C. § 254(e).

Sincerely,

Chairman Kenneth C. Hill

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## TENNESSEE REGULATORY AUTHORITY



460 James Robertson Parkway Nashville, Tennessee 37243-0505

September 10, 2012

Ms. Marlene H. Dortch Office of the Secretary Federal Communications Commission 445 12<sup>th</sup> Street, SW, Room TW-A306 Washington, D.C. 20554

RE: Pursuant to Federal Rule 54.314(a), October 1<sup>st</sup> Certification Requirement for High-Cost Universal Service Support, CC Docket No. 96-45.

Dear Ms. Dortch:

This letter is sent to certify that the eligible carriers subject to the jurisdiction of the Tennessee Regulatory Authority ("Authority")<sup>1</sup> have provided self certification that federal high-cost support will be used only for the provision, maintenance and upgrading of facilities and services for which the support is intended, consistent with 47 U.S.C.§ 254(e) of the Telecommunications Act of 1996. Support for which the eligible carriers are being certified for years 2011 and 2013, include high-cost loop support, local switching support, high-cost support received pursuant to the purchase of exchanges, high-cost model support, hold harmless support and low-income support. No non-rural carriers in Tennessee are eligible to receive this support. A list of eligible rural carriers under the jurisdiction of the Authority and the Study Area Code ("SAC") for each follows:<sup>2</sup>

<u>State</u>	<u>SAC</u>	Company Name
TN	299013	Aeneas Communications, Inc.
TN	290280	Ardmore Telephone Company, LLC
TN	299001	Ben Lomand Communications, Inc.
TN	299007	Budget Phone, Inc.

<sup>&</sup>lt;sup>1</sup> According to Tennessee statutes, telephone cooperatives are not subject to Authority jurisdiction; therefore, they are not being certified in this letter. It is our understanding that cooperatives must file appropriate certification directly with the FCC and USAC. Tennessee has ten (10) telephone cooperatives operating in the state.

<sup>&</sup>lt;sup>2</sup> All listed Tennessee rural incumbents have certified to the TRA that they are not disaggregating and are targeting high-cost support pursuant to 47 C.F.R § 54.315(b) except Citizens Telecommunications Company of Tennessee, LLC. Citizens Telecommunications Company of Tennessee, LLC submitted its Disaggregation Plan to the TRA for approval pursuant to 47 C.F.R. § 54.315(c) in TRA Docket No. 04-00098. The TRA approved the Plan on May 24, 2004.

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<u>State</u>	<u>SAC</u>	Company Name
TN	290552	CenturyTel of Adamsville, Inc.
TN	290557	CenturyTel of Claiborne, Inc.
TN	290574	CenturyTel of Ooltewah-Collegedale, Inc.
TN	299008	Cinergy Communications Company
		(Windstream Norlight)
TN	290580	Citizens Telecommunications Company of the
		Volunteer State, LLC
TN	294336	Citizens Telecommunications Company of
		Tennessee, LLC
TN	290559	Concord Telephone Exchange
TN	290561	Crockett Telephone Company, Inc.
TN	290566	Humphreys County Telephone Company
TN	290570	Loretto Telephone Company, Inc.
TN	290571	Millington Telephone Company, Inc.
TN	290576	Peoples Telephone Company, Inc.
TN	290578	Tellico Telephone Company, Inc.
TN	290575	Tennessee Telephone Company
TN	290581	United Telephone Company
TN	290567	United Telephone Southeast, LLC
TN	290583	West Tennessee Telephone Company, Inc.
TN	299014	Nexus Communications, Inc. (wireline service only)
TN	299019	Four Star Marketing, LLC
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This filing is made pursuant to CC Docket 96-45.

Sincerely,

Kenneth C. Hill Chairman

James M. Allison Director

